STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

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May 26, 2016

16-NWP-097

Mr. Kevin W. Smith, Manager Office of River Protection United States Department of Energy PO Box 450, MSIN: H6-60 Richland, Washington 99352

Mr. Mark A. Lindholm, President Washington River Protection Solutions LLC PO Box 850, MSIN: H3-21 Richland, Washington 99352

Re: Waste Designation for 241-AZ-301 Condensate

References: See page 2

Dear Mr. Smith and Mr. Lindholm:

The Department of Ecology (Ecology) has reviewed the document AZ-301 Condensate Waste Designation and Loading Station, RPP-RPT-58778 (Reference 1). The document concludes that the Dangerous Waste Regulations do not apply to the AZ-301 condensate. That conclusion is not correct.

The AZ-301 Condensate Tank and the associated condenser are ancillary equipment and part of the Double-Shell Tank (DST) System. Condensate which collects in the tank is derived from the treatment and storage of mixed waste. The condensate designates for any listed waste codes associated with the DSTs (F001-F005, in particular), and any other characteristics the condensate may exhibit. An earlier review by the United States Department of Energy (USDOE) arrived at a similar conclusion (Reference 2). This is further supported by the elevated levels of hazardous constituents detected in samples of the condensate (References 3 and 4).

USDOE needs to correct the designation of the AZ-301 condensate and provide Ecology with a revised designation by June 30, 2016.

If you have questions, please contact me at jeff.lyon@ecy.wa.gov or (509) 372-7914.

Sincerely

Teff/Lyon

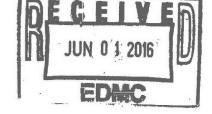
Tank Systems Operation and Closure Project Manager

Nuclear Waste Program

sl/aa

cc: See page 2





16-NWP-097

Mr. Smith and Mr. Lindholm May 26, 2016 Page 2

Reference 1: USDOE-ORP Document, dated July 27, 2015, "AZ-301 Condensate Waste

Designation and Loading Station, RPP-RPT-58778, Rev. 0"

Reference 2: USDOE-RL Document, dated April 20, 2006, "Discovery Site Evaluation Checklist 241-AZ-301, Condensate Receiver Tank"

Reference 3: WRPS Document, dated October 3, 2013, "Final Report for Analysis of AZ-301 Catch Tank Samples Collected in July 2013, RPP-RPT-56012, Rev. 1"

Reference 4: WRPS Document, dated January 26, 2015, "Final Analytical Report for AZ301 Catch Tank Liquid Samples December 2014, RPP-RPT-58458, Rev. 0"

cc electronic:

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Jeremy Johnson, USDOE

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Alex Smith, Ecology

Nancy Ware, Ecology

Cheryl Whalen, Ecology

Kristi Wold, Ecology

USDOE-ORP Correspondence Control

WRPS Correspondence Control

Hanford Facility Operating Record

Environmental Portal

cc:

Rod Skeen, CTUIR Gabriel Bohnee, NPT Russell Jim, YN Steve Hudson, HAB Administrative Record

NWP Compliance Index File: 14.489

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